

INDEX IN SUPPORT OF MOTION TO SEAL

Material	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any
Exhibit B of Salama Declaration	Mr. Khalil requests the sealing of the redacted information because it reveals the location where the declaration was signed.	Revealing the location where Dr. Abdalla signed the declaration presents a security risk to her and her infant son.	This information cannot be partially disclosed. The redaction is narrowly tailored and the substance of the document is left intact for public access.	None.	The Government consents to sealing.
Exhibit C of Salama Declaration	Mr. Khalil seeks the sealing of limited redacted information contained in the exhibits to the declaration of Mr. Sinodis, including sensitive identifying information pertaining to Mr. Khalil, such as his	Revealing his A-number will reveal personal and confidential information about Mr. Khalil. This would cause significant harm to his privacy interests. The limited redactions of the names of authors of letters of support and	Mr. Khalil's A number must be protected from disclosure; it cannot be partially disclosed. The redactions are narrowly tailored and the substance of the communication is left intact for public access.	None.	The Government consents to sealing.

	A number, and identifying information of supporters and professional contacts of Mr. Khalil.	professional contacts is necessary to protect the safety and privacy of those individuals.			
Exhibit G of Salama Declaration	Mr. Khalil requests the sealing of the redacted information because it contains identifying information about the declarants, who are Columbia University professors. Specifically, their names, positions and/or departments are redacted. Mr. Khalil also seeks the complete sealing of Declarations G-7, G-8, G-9, and G-10 because more limited redaction is insufficient to protect the	Revealing the professors' names and positions could open them up to security risks, professional consequences, or other harms.	The redactions are narrowly tailored to mitigate the risk of harm and, to the greatest extent possible, the substance of the documents is preserved.	None.	The Government takes no position on sealing this information.

	identities of the declarants given their unique roles and other identifying details.				
Exhibit H of Salama Declaration	Mr. Khalil requests the sealing of the redacted information because it contains identifying information about the declarants, who are Columbia University students/former students. Specifically, their names and areas of study and/or school of study or graduation are redacted. Personal identifying information of other individuals , including relatives of the students, is also redacted for the safety and privacy of those	Revealing the students'/former students/ names and areas of study and/or school or other identifying information could open them up to harassment, professional or academic consequences, and other harm.	The redactions are narrowly tailored and the substance of the document is left intact for public access.	None.	The Government takes no position on sealing this information.

	individuals and the students.				
Exhibit O of Salama Declaration	Mr. Khalil requests the complete sealing of this document and an “Attorneys’ Eyes Only” designation, <i>see</i> ECF 279, because it contains highly sensitive information.	The exhibit contains a highly sensitive expert psychological assessment of Mr. Khalil. While information of this nature always commands privacy, the need is heightened in this high-profile case alleging retaliation, including disparaging remarks by certain Respondents.	Complete redaction/sealing is necessary to protect Mr. Khalil’s private medical information and to prevent potential misuse of the information. The entirety of the document is highly sensitive.	None.	The Government consents to sealing this medical information.
Exhibit Q of Salama Declaration	Mr. Khalil requests the sealing of the redacted information because it contains identifying information of the declarant, a licensed psychologist. Specifically, the declarant’s name, location, and professional	Revealing the declarant’s identifying information could open the declarant up to harassment, professional consequences, and other harm.	The redactions are narrowly tailored and the substance of the document is left intact for public access.	None.	The Government takes no position on sealing this information.

	affiliations are redacted to preserve the declarant's anonymity and safeguard his privacy and security interests.				
Declaration of Veronica Salama	Mr. Khalil requests the sealing of redacted information contained in this declaration, which is a catalogue of all the exhibits contained therein. The basis for the redactions is set forth in the foregoing entries.	See above	See above	None.	The Government hereby incorporates its positions on each individual exhibit.